

Global Human Rights Policy

Purpose

This Policy broadly defines our approach to respecting human rights in our operations and value chain. We expect our business partners to share our commitment to protecting human rights.

Scope/Application

This policy applies to all employees and contractors of Avnet, Inc., and its subsidiaries worldwide (“Avnet”).

Definitions

- **Human Trafficking and Modern Slavery:** These terms are synonyms. Both “human trafficking” and “modern slavery” refer to recruiting, harboring, transporting, transferring, providing, or obtaining a person for compelled labor or commercial sex acts through force, fraud, threat or coercion.
- **Child Labor:** Child labor means (i) work performed by children who are under the minimum age for that kind of work, as specified by applicable local law, and (ii) work which, because of its detrimental nature or conditions, is inappropriate for children.

Policy

Discrimination

Avnet does not discriminate based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status in hiring and employment practices, such as wages, promotions, rewards, and access to training.

Minority Groups

Avnet respects and strives to protect the human rights of minorities and historically marginalized populations, including women, children, and migrants.

Religious Accommodations

Avnet provides reasonable accommodation for religious practices of workers.

Human Trafficking and Modern Slavery

Avnet shall not engage in human trafficking, modern slavery, or child labor.

Avnet will never knowingly do business with other entities that engage in human trafficking, modern slavery, or child labor.

Avnet shall endeavor to prevent and discourage its business partners from engaging in human trafficking, modern slavery, and child labor.

Consistent with the general policy above, Avnet employees and contractors may not engage in the following acts or omissions:

- Procure commercial sex acts.
- Use forced labor.
- Employ persons below the age of 15 for any work and under the age of 18 for any work that is likely to jeopardize health or safety.
- Employ persons for work who are younger than applicable legal age requirements.
- Deny a person with access to the person's identity, travel, or immigration documents (such as passports or drivers' licenses), regardless of the issuing authority.
- Fail to disclose basic information about the nature of work to applicants, in a format and language accessible to the applicant.
- Make material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment.
- Prevent employees from leaving work or terminating their employment.
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charge job applicants with recruitment fees.

Water and Sanitation

The United Nations recognizes access to water and sanitation as fundamental human rights. Everyone should have access to sufficient, safe, and affordable water. Avnet respects these fundamental rights. We are committed to ensuring that our operations do not interfere with access to water and sanitation.

Training

Avnet is committed to training our workforce on human rights and associated issues. Avnet trains employees on its Code of Conduct, which covers Human Rights.

Consequences for Policy Violations

An employee who violates this policy shall be subject to disciplinary action, up to and including suspension or termination of employment. Avnet may suspend or terminate its association with a contractor who violates this policy.

Actions that violate this policy may also violate applicable law or Avnet's contractual obligations. Consequently, a violation of this policy could result in criminal, civil, and regulatory penalties against Avnet and its employees.

Reporting Violations

All employees and suppliers are encouraged to report any suspected violations of this policy to your manager, a human resources representative, or a code of conduct advisor. You may also contact Avnet's Ethics Alertline (<https://Avnet.alertline.com>).

Avnet prohibits and does not tolerate retaliation of any kind against persons who in good faith report violations of this policy or who cooperate with any internal or governmental investigation of human rights violations, including human trafficking, modern slavery, or child labor.

Avnet will investigate reports of violations of this policy and will take appropriate corrective action within a reasonable period.

References

Avnet supports the OECD Guidelines for Multinational Enterprises, which are a set of nonbinding principles and standards for responsible business conduct covering human rights, the environment, bribery, etc.

Avnet also performs due diligence to avoid doing business with parties that have been identified or designated as bad actors. Many of our major suppliers are members of the Responsible Business Alliance (“RBA”). The RBA Code of Conduct prohibits human trafficking, modern slavery, and child labor, and requires minimum standards for working conditions. Avnet is aligned with the RBA Code of Conduct and its standards.

Administration and Review

Avnet’s Chief People Officer administers this policy.

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